

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:
Amy Leigh Brown and
Richard Dale Brown II
Debtors.

Chapter 7 No. HL-09-04758

Hon. Jeffrey R. Hughes

**CERTIFICATE OF NO TIMELY RESPONSE OR HEARING REQUEST IN RESPONSE TO
CREDITOR'S MOTION FOR RELIEF FROM THE AUTOMATIC STAY AND ENTRY OF ORDER
WAIVING THE PROVISION OF FRBP 4001(A)(3)**

Now comes Mortgage Electronic Registration Systems, Inc., as Nominee for Lender and Lender's Successors and/or Assigns with CitiMortgage, Inc., as Servicer for Lender, by and through its attorneys, Trott & Trott, P.C., and states as follows:

1. Movant, Mortgage Electronic Registration Systems, Inc., as Nominee for Lender and Lender's Successors and/or Assigns with CitiMortgage, Inc., as Servicer for Lender having filed a MOTION FOR RELIEF FROM THE AUTOMATIC STAY AND ENTRY OF ORDER WAIVING THE PROVISION OF FRBP 4001(A)(3) on or about August 28, 2009;
2. A copy of the MOTION FOR RELIEF FROM THE AUTOMATIC STAY AND ENTRY OF ORDER WAIVING THE PROVISION OF FRBP 4001(A)(3) and a copy of the Notice of Motion with regard to the property located at 743 Cherry St, Charlotte, MI 48813-1701, were served upon all interested parties either electronically or by depositing said copies on August 28, 2009 in the U.S. mail;
3. As of September 16, 2009, to the Movant's knowledge and belief, no timely response or hearing request to Creditor's MOTION FOR RELIEF FROM THE AUTOMATIC STAY AND ENTRY OF ORDER WAIVING THE PROVISION OF FRBP 4001(A)(3) has been filed.

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Respectfully Submitted,
Trott & Trott, P.C.

Dated September 16, 2009

/S/ James W. Batchelor (P25500)
/S/ Courtney Roberts (P64717)
/S/ Shawn C. Drummond (P58471)
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